16

17

18

19

20

21

22

23

24

25

26

27

1

LAWRENCE J. SMITH, ESQ. (#6505) PAUL R.M. CULLEN, ESQ. (#12355) 2 7408 West Sahara Avenue Las Vegas, Nevada 89117 3 Telephone: (702) 228-2600 Facsimile: (702) 228-2333 4 lawre3@nvlegaljustice.com paul@nvlegaljustice.com 5 6 ROBERT L. LANGFORD & ASSOCIATES ROBERT L. LANGFORD, ESQ. (#3988) 7 1925 Village Center Circle, Suite 150 Las Vegas, NV 89134 8 Telephone: (702) 379-0440 Facsimile: (702) 991-4223 9 robert@robertlangford.com LAGOMARSINO LAW 10 ANDRE M. LAGOMARSINO, ESQ. (#6711) 11 TAYLOR N. JORGENSEN, ESQ. (#16259) 3005 W. Horizon Ridge Pkwy., #241 Henderson, Nevada 89052 12 Telephone: (702) 383-2864 Facsimile: (702) 383-0065 13 AML@lagomarsinolaw.com Taylor@lagomarsinolaw.com 14 Attorneys for Plaintiffs Rosa Lainez Lemus and G.R.L. 15

BERTOLDO CARTER SMITH & CULLEN

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

ROSA LAINEZ LEMUS, individually and as natural parent and guardian of minor G.R.L.; G.R.L., a minor,

Plaintiffs,

v.

CLARK COUNTY SCHOOL DISTRICT, a political subdivision of the State of Nevada; JESUS F. JARA, in his individual and official capacity; RONNIE GUERZON, in his individual and official capacity; RAYMOND ORTIZ, in his individual and official capacity BROOKE RAWLINS, in her individual and official capacity; DOES I through 10, and ROE CORPORATIONS 1 through 10, inclusive.

Defendants.

2:24-cv-00700-JAD-MDC CASE NO.:

STIPULATION AND ORDER <u>REGARDING BRIEFING AND HEARING</u> DATE ON DEFENDANT'S MOTION TO **DISMISS PLAINTIFF'S SECOND** AMENDED COMPLAINT (ECF NO. 48)

ECF No. 50

1

2

3

4

5

6

7

8

9

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

27

The Parties, by and through their undersigned counsel of record, hereby file the instant Stipulation regarding Defendant's Motion to Dismiss Plaintiff's Second Amended Complaint (ECF No. 48) ("Motion"). Defendant filed their Motion on October 24, 2024. The Court set a hearing on the Motion for Wednesday, December 4, 2024 at 1:30 pm (ECF No. 49). Plaintiff's opposition to the Motion is currently due on November 7, 2024. This is the first stipulation for an extension of Plaintiff's opposition deadline and continuation of the hearing.

This Stipulation is supported by good cause, is the parties' first request, and not for the purpose of delay. After filing Plaintiff's Second Amended Complaint on October 10, 2024, Plaintiff's counsel had two pre-planned trips spanning a total of thirteen (13) days throughout November. Plaintiff's counsel returned to several commitments in other cases. Additionally, Plaintiff's counsel has an out of office legal commitment during the week of November 18, 2024 (which is the week before the Thanksgiving holiday). The totality of Plaintiff's counsel's unavailability supports good cause for the opposition extension and the hearing continuation.

IT IS HEREBY STIPULATED AND AGREED that Plaintiff shall have up to, and including, December 5, 2024, to file her opposition to Defendant's Motion.

IT IS HEREBY FURTHER STIPULATED AND AGREED that Defendant shall have up to, and including, December 19, 2024, to file their Reply in support of Defendant's Motion.

IT IS HEREBY FURTHER STIPULATED AND AGREED between the parties and their undersigned attorneys to continue the Motion Hearing, currently scheduled for December 4, 2024. The parties respectfully request that the new hearing date be continued to a date in late **December/early January** at a date and time selected by the Court.

DATED this 5th day of November, 2024. DATED this 5th day of November, 2024.

LAGOMARSINO LAW CLARK COUNTY SCHOOL DISTRICT OFFICE OF THE GENERAL COUNSEL

/s/ Andre M. Lagomarsino /s/ Melissa Alessi ANDRE M. LAGOMARSINO, ESQ. (#6711) MELISSA ALESSI, ESO. (#9493) TAYLOR N. JORGENSEN, ESO. (#16259) 5100 West Sahara Avenue 3005 W. Horizon Ridge Pkwy., #241 Las Vegas, Nevada 89146

LAGOMARSINO LAW

and G.R.L

Henderson, Nevada 89052
Telephone: (702) 383-2864

BERTOLDO CARTER SMITH & CULLEN
LAWRENCE J. SMITH, ESQ. (#6505)
PAUL R.M. CULLEN, ESQ. (#12355)
7408 West Sahara Avenue
Las Vegas, Nevada 89117
Telephone: (702) 228-2600

ROBERT L. LANGFORD & ASSOCIATES
ROBERT L. LANGFORD, ESQ. (#3988)
1925 Village Center Circle, Suite 150,
Las Vegas, NV 89134
Telephone: (702) 379-0440

Attorneys for Plaintiffs Rosa Lainez Lemus

Telephone: (702) 799-5373 Attorney for Defendants Clark County School District, Jesus F. Jara, Ronnie Guerzon, Raymond Ortiz, and Brooke Rawlins

ORDER

Based on the parties' stipulation [ECF No. 50] and with good cause appearing, IT IS ORDERED that Plaintiff's deadline to file her opposition to Defendant's Motion to Dismiss [ECF No. 48] is extended to December 5, 2024, and Defendant's deadline to reply is extended to December 19, 2024.

IT IS FURTHER ORDERED that the hearing scheduled for December 4, 2024, at 1:30 p.m. is rescheduled to January 6, 2025, at 3:30 p.m.

U.S. District Judge Jennifer A. Dorsey

Dated: November 6, 2024